

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1
THOMPSON HINE LLP
3900 Key Center, 127 Public Square
Cleveland, OH 41144-1291
(216) 566-5936
(216) 566-5800 – facsimile
Jeremy M. Campana (031852000) (Jeremy.Campana@ThompsonHine.com)
Jonathan S. Hawkins (*pro hac vice*) (Jonathan.Hawkins@ThompsonHine.com)

Attorneys for Creditor Global Merchant Cash, Inc.

In re:

ORBIT ENERGY & POWER, LLC,

Debtor.

Chapter 7

Case No.: 22-19628-ABA

Judge Andrew B. Altenburg Jr.

Hearing Date and Time:
August 5, 2025 at 10:00 a.m.

Objection Deadline:
July 31, 2025

STATEMENT AS TO WHY A MEMORANDUM OF LAW IS UNNECESSARY

Thompson Hine LLP (“Thompson Hine”) and its attorneys, Jeremy M. Campana (“Mr. Campana”) and Jonathan S. Hawkins (“Mr. Hawkins,” and together with Thompson Hine and Mr. Campana, “Movants”), respectfully move for an order granting them permission to withdraw as counsel for creditor Global Merchant Cash, Inc. (“GMC”), a creditor in the above-captioned bankruptcy proceedings. Movants shall rely upon the Certification filed with the Motion. Because no novel, unique, or complicated issues of law are presented, no memorandum of law has been filed pursuant to D.N.J. LBR 9013-1(a)(3).

Dated: July 15, 2025

Respectfully submitted,

/s/ Jeremy M. Campana

Jeremy M. Campana (031852000)
Jonathan S. Hawkins (admitted *pro hac vice*)
THOMPSON HINE LLP
3900 Key Center, 127 Public Square
Cleveland, OH 44114
T: 216.566.5936/F: 216.566.5800
Jeremy.Campana@ThompsonHine.com
Jonathan.Hawkins@ThompsonHine.com

Counsel for Global Merchant Cash, Inc